

EXHIBIT A

1 Page 1

2 IN THE UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF OHIO
4 EASTERN DIVISION

5
6 IN RE: NATIONAL PRESCRIPTION MDL No. 2804
7 OPIATE LITIGATION

8 Case No.
9 1:17-md-2804

10 Judge Dan Aaron
11 This Document Relates To: Polster

12 The County of Lake, Ohio v.
13 Purdue Pharma L.P., et al.
14 Case No. 18-op-45032

15 The County of Trumbull, Ohio v.
16 Purdue Pharma L.P., et al.,
17 Case No. 18-op-45079

18 Track 3 Cases

19 Remote videotaped deposition of
20 JOSEPH RANNAZZISI

21
22 September 22, 2021
23 2:29 p.m.

24
25 Renee L. Pellegrino, RPR, CLR
(Appearing Remotely)

1 the authorization and the limitations of that
2 authorization.

3 Q. Mr. Rannazzisi, do you have any
4 personal knowledge based on public information
5 of a Walgreens pharmacist in Ohio ever filling
6 an illegitimate prescription?

7 A. No.

8 Q. Do you have any personal
9 recollection, based on your own interactions
10 with dispensers unrelated to DEA activities,
11 of a Walgreens pharmacist in Ohio ever filling
12 an illegitimate prescription?

13 A. No.

14 Q. Do you have any personal knowledge
15 based on public information of Walgreens
16 filling illegitimate prescriptions anywhere
17 else in the country?

18 A. Could you define what you mean by
19 "illegitimate prescriptions"?

20 Q. You're a pharmacist, correct,
21 Mr. Rannazzisi?

22 A. Yes.

23 Q. When I say "illegitimate
24 prescription" to you, what do you understand
25 that term to mean?

1 A. Well, it could mean any number of
2 things; prescriptions that don't meet the
3 elements of a controlled substance
4 prescription, prescriptions that don't have a
5 valid DEA number attached to the doctor who's
6 prescribing it, prescriptions that are not
7 written in the usual course of professional
8 practice and not for legitimate purpose.
9 There's a lot of different things. If you're
10 asking me that question, I would have to say
11 yes.

12 Q. What is the personal knowledge
13 that you have related to Walgreens filling
14 illegitimate prescriptions somewhere outside
15 of Ohio?

16 A. Personal knowledge is based
17 upon -- based upon investigations that were
18 conducted by DEA that were -- where documents
19 were released to the public.

20 Q. What investigations are you
21 referring to?

22 A. Florida.

23 Q. Anything else other than Florida?

24 A. That's the only one that comes to
25 mind right now as I sit here today.

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1 Q. If you think of any others while
2 we're together today, will you please let me
3 know?

4 A. Sure.

5 Q. Do you have any personal knowledge
6 based on public information of any other chain
7 pharmacy in Ohio filling illegitimate
8 prescriptions?

9 MR. BENNETT: Objection. Vague as
10 to time.

11 Q. At any time.

12 A. Personal knowledge based on
13 publicly available information, no.

14 Q. You don't have any -- strike that.

15 Do you have any personal knowledge
16 based on publicly available information of a
17 Walgreens pharmacist in Ohio filling a
18 prescription that was later diverted?

19 A. Personal knowledge, no.

20 Q. What about anywhere else in the
21 country? Do you have any personal knowledge
22 based on public information of a Walgreens
23 pharmacist filling a prescription that was
24 later diverted?

25 A. I have knowledge of situations

1 where there was diversion, yes, I do.

2 Q. What is that knowledge?

3 A. Florida.

4 Q. When you say "Florida," what
5 personal knowledge do you have about Walgreens
6 pharmacists in Florida filling prescriptions
7 that were later diverted?

8 A. There was a Florida pharmacy in
9 Oviedo -- Oviedo, Florida, where the police
10 chief notified Walgreens on numerous occasions
11 regarding people who were buying drugs in that
12 particular Walgreens pharmacy and then were
13 dealing them out in the parking lot. Those
14 documents are actually on the internet.
15 That's how my personal knowledge is.

16 Q. Is the basis of the knowledge you
17 just related -- does that come from the DEA's
18 order to show cause in the Florida matter
19 against Walgreens?

20 A. Well, it is in the order to show
21 cause, but that particular knowledge also
22 comes from the documents that were on the
23 internet that were on the Miami field division
24 website about three years ago.

25 Q. Other than documents that you saw

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1 on the Miami field division's website and the
2 order to show cause, do you have any personal
3 knowledge at all about DEA's investigation of
4 Walgreens in Florida?

5 MR. BENNETT: Objection.

6 Counsel, is the qualification of
7 public, based on public knowledge or public
8 information --

9 MS. SWIFT: Yes.

10 MR. BENNETT: -- because your
11 question didn't include that?

12 MS. SWIFT: Well, let me qualify
13 it. I understand you're going to instruct him
14 not to answer the question if it's not based
15 on public information. Is that fair, James?

16 MR. BENNETT: That would be my
17 instruction to the witness, correct.

18 MR. LANIER: And my request would
19 be that the question itself include that
20 information and limitation so I don't have to
21 redirect to clarify.

22 Q. Mr. Rannazzisi, before I reask the
23 question, are you going to follow James
24 Bennett's instruction not to answer the one
25 that I just asked?

1 A. Yes.

2 Q. Do you have -- strike that.

3 Other than information available
4 on the internet from the Miami field division
5 and the order to show cause against Walgreens
6 in the DEA matter in Florida, do you have any
7 other public information, any personal
8 knowledge about any other public information
9 related to a Walgreens pharmacist filling a
10 prescription that was later diverted?

11 A. I have no public information after
12 that.

13 Q. Do you have any personal
14 recollection based on your own interactions
15 with anyone at Walgreens of any other
16 information of a Walgreens pharmacist filling
17 a prescription that was later diverted?

18 MR. BENNETT: Objection.

19 Witness is instructed that he's
20 not authorized to disclose non-public
21 information from DEA investigations or
22 activities. To the extent you can answer the
23 question without disclosing non-public DEA
24 information from investigations or activities,
25 you may answer the question.

1 A. I only -- my information base is
2 based on my time at the Office of Diversion
3 Control, and much of it is non-public.

4 Q. Do you have any other information
5 other than that you've shared already, any
6 other public information, personal knowledge
7 about public information related to any
8 Walgreens pharmacist anywhere filling a
9 prescription that was later diverted?

10 A. No.

11 Q. Have you ever been -- strike that.
12 What about any other chain
13 pharmacy, Walmart, CVS, Giant Eagle, Rite-Aid?
14 Do you have any personal knowledge of any of
15 their pharmacists in Ohio ever filling a
16 prescription that was later diverted?

17 MR. BENNETT: Objection.

18 Same instruction regarding
19 non-public information from DEA investigations
20 or activities. To the extent you can answer
21 that question with publicly available
22 information, you may.

23 A. I don't have any publicly
24 available information pertaining to that.

25 Q. Have you ever been inside a